Peter J. Richardson (ISB No. 3195) Greg Adams (ISB 7454) Richardson Adams, PLLC 515 N. 27th Street P.O. Box 7218 Boise, Idaho 83702 Telephone: (208) 938-7901

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Attorneys for the Industrial Customers of Idaho Power

RECEIVED 2015 JAN -6 PM 2: 55 IDAHO PUBLIC UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF PACIFICORP D/B/A ROCKY
MOUNTAIN POWER AND IDAHO
POWER COMPANY FOR AN ORDER
AUTHORIZING THE EXCHANGE OF
CERTAIN TRANSMISSION ASSETS.

PETITION TO INTERVENE
OF THE INDUSTRIAL CUSTOMERS
OF IDAHO POWER

COMES NOW, The Industrial Customers of Idaho Power, hereinafter referred to as "Intervenor," and pursuant to this Commission's Rules of Procedure, Rule 71 IDAPA 31.01.01.71 hereby petitions the Commission for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

Industrial Customers of Idaho Power c/o Peter J. Richardson Richardson & O'Leary 515 N. 27th St P.O. Box 7218 Boise, Idaho 83702 Telephone: (208) 938-7901

Fax: (208) 938-7904

peter@richardson and oleary.com

Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Peter J. Richardson as noted above and to:

Dr. Don Reading 6070 Hill Road Boise, Idaho 83703 (208) 342-1700 Tel (208) 384-1511 Fax dreading@mindspring.com

- 2. This Intervenor, the Industrial Customers of Idaho Power, ("ICIP") is an unincorporated association of Schedule 19 customers of Idaho Power. All ICIP members receive electric utility services from Idaho Power Company. The ICIP claims a direct and substantial interest in this proceeding in that the outcome will affect the company's electric rates for its industrial customers.
- 3. This Intervenor, in its capacity as a representative of industrial customers intends to participate herein as a party, and if necessary, to introduce evidence, submit comments, and fully participate in any hearing that may occur including the calling and cross examination of witnesses. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.
- 5. Without the opportunity to intervene herein, this Intervenor would be without any effective means of participation in this proceeding which may have a material impact on its members' electric rates and/or service.

6. Granting this Intervenor's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

WHEREFORE, the Industrial Customers of Idaho Power respectfully requests that this Commission grant its Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument at any hearing that may occur, and to otherwise fully participate in these proceedings.

DATED this 6th day of January 2015.

Richardson Adams, PLLC

Peter J. Richardson

Industrial Customers of Idaho Power

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6th day of January, 2015, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY THE INDUSTRIAL CUSTOMERS OF IDAHO POWER, was served as indicated below to:

| Ms. Jean Jewell Commission Secretary Idaho Public Utilities Commission P O Box 83720 | X_ Hand Delivery U.S. Mail, postage pre-paid Facsimile Electronic Mail |
|---|---|
| Boise ID 83720-0074 | |
| Julia A. Hilton Regulatory Dockets Idaho Power Company 1221 West Idaho Street Boise, Idaho 83707-0070 jhilton@idahopower.com dockets@idahopower.com | _X Hand Delivery U.S. Mail, postage pre-paid Facsimile Electronic Mail |
| Daniel Solander Rocky Mountain Power 201 South Main Street, Ste. 2300 Salt Lake City, UT 84111 Daniel.solander@pacificorp.com | Hand Deliver X_U.S. Mail, postage pre-paidFacsimile X_ Electronic Mail |
| Data Request Response Center PacifiCorp 825 NE Multnomah, Ste. 2000 Portland, OR 97232 datarequest@pacificorp.com | Hand Deliver X_U.S. Mail, postage pre-paid Facsimile X_ Electronic Mail |

Nina Curtis

Administrative Assistant